DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JUSTIN PULLIAM,	§	
Plaintiff,	§ §	
v.	§ §	
	§	
COUNTY OF FORT BEND, TEXAS;	§	CIVIL ACTION NO.: 4:22-cy-04210
SHERIFF ERIC FAGAN, in his	§	
individual capacity; OFFICER	§	
ROBERT HARTFIELD, in his	§	
individual capacity; OFFICER	§	
JONATHAN GARCIA, in his	§	
individual capacity; OFFICER	§	
TAYLOR ROLLINS, in his individual	§	
capacity; and OFFICER RICKY	§	
RODRIGUEZ, in his individual	§	·
capacity,	§	

Defendants.

DECLARATION OF KEVIN HEDGES IN SUPPORT OF DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

- I, Kevin Hedges, declare and state as follows:
- 1. I am a citizen of the United States and a resident of Fort Bend County, Texas. I am over eighteen years of age and competent to make this declaration. I knowingly and voluntarily submit this declaration in support of Defendants' Response to Plaintiff's Motion for Partial Summary Judgment based on my personal knowledge of these facts, and I would competently testify to them under oath.

- 2. I am an attorney with the Fort Bend County Attorney's Office, which represents Defendants in this action.
- 3. Exhibit 1 to Defendants' Response to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition excerpts of Justin Pulliam.
- 4. Exhibit 2 to Defendants' Response to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition excerpts of Detective Travis James.

I declare under penalty of perjury that the foregoing is true and correct and of my own knowledge.

SIGNED and DATED this 27th day of October, 2023.

Kevin Hedges